

Fact Sheet



For Final Significant Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the original Fact Sheet corresponding with the issuance of the initial Title V operating permit issued on November 1, 2007.

Permit Number: R30-NGGP-2007-03900049-SM01
Application Received: March 21, 2008
Plant Identification Number: 03900049
Permittee: **Columbia Gas Transmission Corporation**
Facility Name: Coco Compressor Station
Mailing Address: 1700 MacCorkle Avenue, SE
Charleston, WV 25314

Permit Action Number: SM01 Revised: July 29, 2008

Physical Location:	Elkview, Kanawha County, West Virginia
UTM Coordinates:	463.6 km Easting • 4250.3 km Northing • Zone 17
Directions:	Traveling from the intersection of State Route 114 and secondary route 49, proceed 3.4 miles and bear right on Route 49. Go 3.6 miles from the intersection of Routes 47 and 49 and turn left onto secondary County Route 71 (Coco Road). Travel approximately 1.5 miles, the station is located on the right side of the road.

Facility Description

The Coco Station is a natural gas storage facility covered by Standard Industrial Classification (SIC) 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of five (5) 880-hp, one (1) 1,100-hp and one (1) 4,000-hp natural gas fired reciprocating engines, one (1) 275-hp and one (1) 306-hp emergency generators, one (1) heating system boiler, three (3) heaters, and numerous storage tanks of various sizes.

This significant modification permit is to incorporate changes from the Class II administrative update R13-2087D, issued on June 5, 2008; added one (1) 38.0 MM Btu/hr natural gas-fired line heater (HTR4).

Emissions Summary

The changes associated with this significant modification permit result in the following:

Change in Potential Emissions	
Pollutant	Change in Potential Emissions (+ or -), TPY
NOx	+ 8.3
CO	+ 6.7
VOC's	+ 0.9
PM10	+ 0.3
SO2	+ 0.1
Formaldehyde	+ 0.01

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of criteria pollutants (VOC and NOx), over 10 tons per year of a single hazardous air pollutant (HAP), and over 25 tons per year of aggregate hazardous air pollutants (HAPs). This facility has the potential to emit 179.0 tons/yr of CO, 990.3 tons/yr of NOx and 19.58 tons/yr of Formaldehyde after the modification. Due to this facility's potential to emit over 100 tons per year of criteria pollutant and over 10 tons per year of a single HAP, Columbia Gas Transmission Corporation is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	New Source Construction Permit
	45CSR30	Operating permit requirement.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR15, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2087D	June 5, 2008	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the General Requirement Comparison Table B which may be downloaded from DAQ's website.

Determinations and Justifications

40 C.F.R. 63, Subpart DDDDD—National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters

Note: On July 30, 2007 a court ruled that 40 C.F.R. 63, Subpart DDDDD be vacated and remanded. State agencies are to implement the vacated MACT via the 112(j) case-by-case equivalency via Title V permit conditions provisions. DAQ has decided to use the current MACT rule (DDDDD) as its guide (unless EPA provides other guidance) to avoid inconsistencies and resource issues.

Columbia's natural gas-fueled, direct-fired line heater HTR4 would have been subject to the above referenced MACT if the MACT had not been vacated and remanded, i.e., Columbia's Coco Compressor Station is a major source of HAPs; the process heater is new; the new process heater fires natural gas; the heater is a watertube type heater; and the new process heater has a design heat input greater than 10 MM Btu/hr.

Columbia's natural gas-fueled, direct-fired line heater HTR4 is in the *large gaseous fuel subcategory* which includes any watertube process heater that burns gaseous fuels not combined with any solid fuels, has a rated capacity of greater than 10 MMBtu per hour heat input, and does not have a federally enforceable annual average capacity factor of equal to or less than 10 percent.

The DAQ has decided to incorporate the requirements of subpart DDDDD into Columbia's R13-2087D permit which is a part of the registration for this facility under Title V General Permit.

Section 5.0 of the Title V General permit is applicable to HTR4 because HTR4 is a 38.0 MM Btu/hr (between greater than 10 MM Btu/hr and less than 100 MM Btu/hr) Indirect Heat Exchanger.

40 CFR 64 – This heater HTR4 is not a major source, do not have any add-on control; therefore, in accordance with 40 C.F.R § 64.2(a), CAM is not applicable to this facility.

Non-Applicability Determinations

Please refer to previous fact sheet.

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: June 13, 2008
Ending Date: July 14, 2008

All written comments should be addressed to the following individual and office:

U.K.Bachhawat
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street, S.E.
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

U.K.Bachhawat
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1256 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

N/A